

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

DONALD J. TRUMP, Candidate for
President of the United States of
America,

Plaintiffs

v.

THE WISCONSIN ELECTIONS
COMMISSION, et al.,

Defendants.

No. 2:20-cv-01785

**PROPOSED INTERVENOR-DEFENDANT THE DEMOCRATIC NATIONAL
COMMITTEE'S MOTION TO INTERVENE**

Proposed Intervenor-Defendant Democratic Services Corporation/Democratic National Committee (the “DNC”) respectfully moves for leave to participate in this action to defend its interests against the claims asserted by Plaintiff. For the reasons discussed in the memorandum in support, the DNC is entitled to intervene in this case as a matter of right under Federal Rule of Civil Procedure 24(a)(2). In the alternative, the DNC requests permissive intervention pursuant to Rule 24(b).

In accordance with Rule 24(c), the DNC intends to file a proposed answer to Plaintiff’s complaint. That complaint, however, is 72 pages and 302 paragraphs long, and the DNC needs additional time to prepare a proposed answer. Because of the expedited character of these proceedings, counsel are submitting the DNC’s motion to intervene and a proposed order at this time, and will file a proposed answer later on Friday, December 4, 2020.

WHEREFORE, and subject to the submission of its proposed answer on December 4, the DNC respectfully requests that the court grant it leave to intervene in the above-captioned matter.

DATED: December 4, 2020

Seth P. Waxman*
WILMER CUTLER PICKERING HALE AND
DORR LLP
1875 Pennsylvania Ave., NW
Washington, DC 20006
(202) 663-6000
seth.waxman@wilmerhale.com

David S. Lesser*
Jamie Dycus*
WILMER CUTLER PICKERING HALE AND
DORR LLP
7 World Trade Center
250 Greenwich Street
New York, NY 10007
(212) 230-8800
david.lesser@wilmerhale.com
jamie.dycus@wilmerhale.com

Matthew W. O'Neill
SBN 1019269
FOX, O'NEILL &
SHANNON, S.C.
622 North Water Street,
Suite 500
Milwaukee, WI 53202
(414) 273-3939
mwoneill@foslaw.com

Respectfully Submitted,

/s/ Michelle M. Umberger

Charles G. Curtis, Jr.
SBN 1013075
Michelle M. Umberger
SBN 1023801
Sopen B. Shah
SBN 1105013
Will M. Conley
SBN 1104680
PERKINS COIE LLP
33 East Main St., Suite 201
Madison, WI 53703
(608) 663-7460
ccurtis@perkinscoie.com
mumberger@perkinscoie.com
sshah@perkinscoie.com
wconley@perkinscoie.com

Marc E. Elias*
John Devaney*
Zachary J. Newkirk*
PERKINS COIE LLP 700 Thirteenth St.,
N.W., Suite 800
Washington, D.C. 20005
(202) 654-6200
melias@perkinscoie.com
jdevaney@perkinscoie.com
znewkirk@perkinscoie.com

Counsel for Proposed Intervenor-Defendant

*Application for admission pending

CERTIFICATE OF SERVICE

I hereby certify that on Friday, December 4, 2020, I filed a copy of the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/Michelle M. Umberger
Counsel for Proposed Intervenor